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November 19, 2020

Filed Electronically via ECF

Honorable Gabriel W. Gorenstein
U.S. Magistrate Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007

MEMORANDUM ENDORSEMENT

**Re: Prisilla Cabrera vs. Commissioner of Social Security
Civil Action Number: 1:20-cv-03883-GWG**

Dear U.S. Magistrate Judge Gorenstein,

The undersigned writes on behalf of Plaintiff, with the consent of Defendant's counsel, to respectfully request an extension of time to file Plaintiff's Motion for Judgment on the Pleadings and supporting Memorandum of Law in the above matter, and to respectfully request approval of the proposed amended briefing schedule.

Plaintiff's motion and brief are currently due Monday, November 23, 2020. The undersigned requests a thirty-seven (37) day extension of time to file Plaintiff's motion and brief, or up to and including Wednesday, December 30, 2020. This is Plaintiff's first request for an extension and opposing counsel consents to this request. The reason for the requested extension of time is that counsel's office has had a significant increase of workload due to the global pandemic and therefore is facing multiple simultaneous deadlines for filing briefs that make this office unable to meet all deadlines. The pandemic created a backlog of records that are now being filed at a rapid pace. This is making counsel's staff's workload unusually heavy and therefore makes it difficult to thoroughly and properly prepare the brief by the current deadline. With this motion we are attempting to manage the filings which will enable us to prepare a proper merits Brief that meets the expectations of this Court and advocates properly for the client.

In accordance with the Court's Scheduling Order in this matter (Dkt. No. 12), Plaintiff proposes the following briefing schedule:

1. Plaintiff's motion for judgment on the pleadings and supporting memorandum due December 30, 2020.
2. The Commissioner's responsive pleading and any cross-motion due March 3, 2020.
3. Plaintiff's reply (if any) due March 17, 2020.

Thank you for your consideration.

Respectfully,

/s/ Howard D. Olinsky
Howard D. Olinsky, Esq.
Bar Code H06529
Counsel for Plaintiff

CC: Susan Branagan (opposing counsel)

SO ORDERED.

Dated: December 7, 2020

New York, NY


Honorable Gabriel W. Gorenstein
U.S. Magistrate Judge